

LAWRENCE M. HADLEY (SBN 157728)
lhadley@mckoolsmithhennigan.com
MCKOOL SMITH HENNIGAN, P.C.
865 South Figueroa Street, Suite 2900
Los Angeles, California 90017
(213) 694-1200 - Telephone
(213) 694-1234 - Facsimile

Attorneys for Plaintiff MEDSQUIRE, LLC

PEPPER HAMILTON LLP
Noah V. Malgeri (*admitted pro hac vice*)
15th Floor, Oliver Street Tower
125 High Street
Boston, MA 02110-2736
617.204.5128 - Telephone
617.204.5150 - Facsimile

Attorneys For Defendant
NextGen Healthcare Information Systems, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MEDSQUIRE, LLC

Plaintiff,

vs.

SPRING MEDICAL SYSTEMS, INC.;
QUEST DIAGNOSTICS, INC.;
NEXTGEN HEALTHCARE
INFORMATION SYSTEMS, INC.;
HENRY SCHEIN MEDICAL SYSTEMS,
INC.; HEWLETT-PACKARD
COMPANY; APRIMA MEDICAL
SOFTWARE, INC.;
eCLINICALWORKS, LLC; MED3000,
INC.; PULSE SYSTEMS, INC.;
COMPULINK BUSINESS SYSTEMS,
INC.; NAVINET, INC.; successEHS,
INC.; athenaHEALTH, INC.

Defendants.

) Case No. CV11-4504-JHN (PLAx)

) **STIPULATION OF DISMISSAL
WITH PREJUDICE RE NEXTGEN
HEALTHCARE INFORMATION
SYSTEMS, INC.**

) **[[PROPOSED] ORDER FILED
CONCURRENTLY HEREWITH]**

1 WHEREAS, Plaintiff Medsquire, LLC, and Defendant NextGen Healthcare
2 Information Systems, Inc. ("NextGen") have reached a resolution of this matter;

3 WHEREAS, Plaintiff agrees to dismiss all its claims with prejudice pursuant to
4 Federal Rule of Civil Procedure 41(a);

5 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and among Plaintiff
6 Medsquire, LLC, and Defendant NextGen that all claims in the above-captioned
7 action shall, in accordance with the following Order of Dismissal, be dismissed with
8 prejudice and that each party shall bear its own costs, expenses and attorneys' fees.
9

10 DATED: January 10, 2012

MCKOOL SMITH HENNIGAN, P.C.

11
12 By /s/ Lawrence M. Hadley
13 Lawrence M. Hadley

14 Attorneys for Plaintiff, MEDSQUIRE LLC
15

16 DATED: January 10, 2012

PEPPER HAMILTON LLP

17
18 By /s/ Noah V. Malgeri
19 Noah V. Malgeri

20 Attorneys for Defendant NextGen Healthcare
21 Information Systems, Inc.
22
23
24
25
26
27
28